

**CIVIL MINUTE ENTRY**

<b>BEFORE:</b>	Magistrate Judge Steven L. Tiscione
<b>DATE:</b>	April 13, 2022
<b>TIME:</b>	10:00 A.M.
<b>DOCKET NUMBER(S):</b>	CV-18-5628 (RPK)
<b>NAME OF CASE(S):</b>	<b>HAMMOCK V. MOVING STATE TO STATE, LLC ET AL</b>
<b>FOR PLAINTIFF(S):</b>	Jones
<b>FOR DEFENDANT(S):</b>	Moza
<b>NEXT CONFERENCE(S):</b>	<b>See rulings below</b>
<b>FTR/COURT REPORTER:</b>	N/A
<p><b><u>RULINGS FROM TELEPHONE CONFERENCE:</u></b></p> <p>The docket should be amended to reflect that Attorney Meir Moza represents Defendants Moving State to State, LLC, State to State Moving NY Inc, State to State Moving Group LLC, Direct Van Lines Services Inc., Around the Clock Moving Services Inc., and Yarin Nadel. Parties will confer and submit a proposed discovery schedule no later than April 22, 2022 by completing and filing the attached discovery plan worksheet.</p>	

## DISCOVERY PLAN WORKSHEET

### Phase I (Pre-Settlement Discovery)

**Deadline for completion of Rule 26(a) initial disclosures and HIPAA-compliant records authorizations:**

**Completion date for Phase I Discovery as agreed upon by the parties:**  
*(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)*

**Date for initial settlement conference:**  
*(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)*

### Phase II (Discovery and Motion Practice)

**Motion to join new parties or amend the pleadings:**  
*(Presumptively 15 days post initial settlement conference)*

**First requests for production of documents and for interrogatories due by:**  
*(Presumptively 15 days post joining/amending)*

**All fact discovery completed by:**  
*(Presumptively 3.5 months post first requests for documents/interrogatories)*

**Exchange of expert reports completed by:**  
*(Presumptively 30 days post fact discovery)*

**Expert depositions completed by:**  
*(Presumptively 30 days post expert reports)*

**COMPLETION OF ALL DISCOVERY BY:**  
*(Presumptively 9 months after Initial Conference)*

**Final date to take first step in dispositive motion practice:**  
*(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)*

**Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?**